

DOLLY M. TROMPETER, ESQ.
CA Bar ID No. 235784
Peña & Bromberg, PLC
2440 Tulare St., Suite 320
Fresno, CA 93721
Telephone: 415-271-8604
Fax: 866-282-6709
dolly@dollydisabilitylaw.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Rafael Macias,)	Case No. 1:23-cv-01034-SKO
Plaintiff,)	STIPULATION AND UNOPPOSED
vs.)	MOTION FOR EXTENSION OF
Kilolo Kijakazi, Acting)	TIME; ORDER
Commissioner of Social Security,)	(Doc. 14)
Defendant.)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from October 11, 2023 to December 11, 2023, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due on the same week. For the weeks of October 9, 2023 and October 16, 2023,

Counsel has five merit briefs and four reply briefs due. Additionally, Counsel is currently on stand-by for jury service. Defendant does not oppose the requested extension. Counsel apologizes to the Defendant and Court for any inconvenience this may cause.

Respectfully submitted,

Dated: October 10, 2023 PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Dolly M. Trompeter
DOLLY M. TROMPETER
Attorneys for Plaintiff

Dated: October 11, 2023 PHILLIP A. TALBERT
United States Attorney
PETER K. THOMPSON
Acting Regional Chief Counsel, Region IX
Social Security Administration

By: */s/ Michael Marriott
Michael Marriott
Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on Oct. 11, 2023)

ORDER

Pursuant to the parties' foregoing stipulation and unopposed motion for an extension of time (Doc. 14), IT IS HEREBY ORDERED that Plaintiff shall have an extension, up to and including **December 11, 2023**, to file Plaintiff's Motion for Summary Judgment. The deadlines in the Scheduling Order (Doc. 5) are hereby extended accordingly.

IT IS SO ORDERED.

Dated: **October 12, 2023**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE